

# **EXHIBIT D**

From: Gina Altomare <gina.altomare@sbcglobal.net>  
Subject: M.H. v. County of Alameda - Notice of Inspection  
Date: August 16, 2013 10:45:27 AM PDT  
To: Valerie Ly <vly@andradalaw.com>, Randy Andrada  
<randrada@andradalaw.com>, Matt Grigg <mmg@hudginslaw.com>, Nancy  
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John Burris <Burris@lmi.net>  
Cc: "haddad.sherwin@sbcglobal.net Haddad & Sherwin"  
<haddad.sherwin@sbcglobal.net>, Genevieve Guertin  
<genevieve.guertin@sbcglobal.net>



1 Attachment, 248 KB

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Dear Counsel:

Attached please find Plaintiffs' notice of inspection for Martin Harrison's original medical records by forensic documents examiner Patricia Fisher at 8:00 a.m. on August 28, 2013 at the following address:

1990 North California Boulevard, 8th Floor  
Walnut Creek, CA 94596  
(510) 987-8129

A hard copy will follow by mail.

Thank you,

Gina

Gina Altomare  
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[RFP5.Notice...pdf \(248 KB\)](#)

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8 Attorneys for Plaintiff M.H., a minor through his  
 9 Guardian Ad Litem, Michelle Henshaw

10 MICHAEL J. HADDAD, Esq./ State Bar #189114  
 11 JULIA SHERWIN, Esq./State Bar #189268  
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 15 505 Seventeenth Street  
 16 Oakland, CA 94612  
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 18 Facsimile: (510) 452-5510

19 Attorneys for Plaintiffs Joseph Harrison, Krystle  
 20 Harrison, Martin Harrison, Jr., and Tiffany Harrison

### UNITED STATES DISTRICT COURT

### FOR THE NORTHERN DISTRICT OF CALIFORNIA

21 M.H., a minor, through his Guardian Ad Litem, }  
 22 Michelle Henshaw, JOSEPH HARRISON, KRYSTLE } Case No. C11-2868 JST (MEJ)  
 23 HARRISON, MARTIN HARRISON, JR., and }  
 24 TIFFANY HARRISON, all Individually and as Co- }  
 25 Successors in Interest of Decedent MARTIN }  
 26 HARRISON, }  
 27 Plaintiffs, }  
 28 vs. }  
 29 COUNTY OF ALAMEDA, a municipal corporation; }  
 30 SHERIFF GREGORY J. AHERN, in his individual and }  
 31 official capacities; DEPUTIES MATTHEW AHLF, }  
 32 ALEJANDRO VALVERDE, JOSHUA SWETNAM, }  
 33 ROBERTO MARTINEZ, ZACHARY LITVINCHUK, }  
 34 RYAN MADIGAN, MICHAEL BARENO, }  
 35 FERNANDO ROJAS-CASTANEDA, SHAWN }  
 36 SOBRERO, SOLOMON UNUBUN; MEGAN HAST, }  
 37 A.S.W.; CORIZON HEALTH, INC., a Delaware }  
 38 corporation; HAROLD ORR, M.D.; ZELDA }  
 39 SANCHO, L.V.N.; and DOES 5-20, individually, }  
 40 jointly and severally, }  
 41 Defendants. }

**PLAINTIFFS' REQUEST FOR  
 PRODUCTION OF DOCUMENTS  
 AND THINGS TO ALL  
 DEFENDANTS (NOTICE OF  
 INSPECTION) (SET FIVE)**

1 PROPOUNDING PARTY: PLAINTIFFS JOSEPH HARRISON, KRYSTLE  
 2 HARRISON, MARTIN HARRISON JR., and TIFFANY  
 3 HARRISON

4 RESPONDING PARTY: ALL DEFENDANTS

5 SET NO.: FIVE

6 Plaintiffs demand pursuant to Federal Rule of Civil Procedure 34 that, at 8:00 a.m. on  
 7 August 28, 2013, Defendants produce for inspection by forensic documents examiner Patricia  
 8 Fisher all of the following items or categories of items in their possession, custody, or control, at  
 9 **1990 North California Boulevard, 8<sup>th</sup> Floor, Walnut Creek, CA 94596, (510) 987-8129.** The  
 10 inspection shall continue from day to day until completed. Further, Plaintiffs request that  
 11 Defendants serve a written response as to each item or category of item pursuant to Federal Rule of  
 12 Civil Procedure 34(b).

13 Privilege: If any document is withheld under a claim of privilege, provide a privilege log,  
 14 including but not limited to a list identifying each document, the date, the author or person  
 15 responsible for creating the document, the recipient of the document, the subject matter of the  
 16 document, the privilege claimed, the number of pages of any document and length of any recording.

17 Missing documents: If any document is not currently in your possession, custody, or  
 18 control, state whether it is missing or lost; has been destroyed, and if so, in what manner; has been  
 19 involuntarily or voluntarily transferred to others, and if so, to whom; had otherwise been disposed  
 20 of, and if so, how. Describe in detail the nature of, circumstances surrounding, and date of  
 21 disposition of the document.

## 22 DEFINITIONS

23 "DOCUMENTS" or "DOCUMENTATION" (whether written in upper or lower case)  
 24 means handwriting, typewriting, printing, photostating, photocopying, recording, and every other  
 25 means of recording upon any tangible thing, any form or communication or representation,  
 26 including letters, words, pictures, sounds or symbols, or combinations thereof, as defined by  
 27 California Evidence Code Section 250, and includes, but is not limited to audio and video  
 28 recordings, letters, drafts, notebooks, diaries, calendars, notes, correspondence of any kind, records,  
 reports of any kind, quality control reports, investigation reports, inspection reports, insurance

1 policies, insurance claims forms, forms of any kind, statements, invoices, bills, bills of lading, bills  
2 of sale, permits, licenses, memoranda, minutes of meetings of any kind, telephone messages,  
3 directives, court orders, court documents of any kind, maintenance records, maintenance reports,  
4 inspection forms, inspection reports, inspection data, research data, studies, analyses, reports of  
5 analyses, experiments, cost surveys, tests, test data, checklists, data sheets, specifications, sales  
6 brochures, owners' manuals, operations' manuals, maintenance manuals, instruction manuals,  
7 procedures' manuals, manuals of any kind, itemizations, agendas, compliance orders, notices to  
8 abate, contracts, agreements, bids, computer printouts, e-mails, computer files, notebooks, diaries,  
9 tallies, receipts, photographs, videos, transcripts, statements, minutes, and information/data  
10 summaries, and any and all electronic data, including but not limited to emails, logs, notes, reports,  
11 drafts, and Computer Assisted Dispatch (CAD) information.

## REQUEST

13       1. Please produce all original DOCUMENTS reflecting medical records of Martin C.  
14 Harrison, deceased, including but not limited to all records from Glenn Dyer Detention Facility,  
15 Santa Rita Jail, and all documents generated and/or maintained by Defendant Corizon Health, Inc.  
16 and the County of Alameda for forensic inspection, copying, testing and/or sampling by forensic  
17 documents examiner Patricia Fisher, pursuant to Federal Rule of Civil Procedure 34.

18                  Please produce these DOCUMENTS on August 28, 2013, at 8:00 a.m. at the  
19 following address:

**1990 North California Boulevard, 8<sup>th</sup> Floor  
Walnut Creek, CA 94596  
(510) 987-8129**

23 | Dated: August 16, 2013

HADDAD & SHERWIN

Hina Altaf are

GINA ALTOMARE  
Attorneys for Plaintiffs  
JOSEPH HARRISON, KRYSTLE HARRISON,  
MARTIN HARRISON JR., and TIFFANY  
HARRISON

***PROOF OF SERVICE***

(FRCivP 5 AND 28 USC § 1746)

Re: *M.H. v. County of Alameda, et al.*, No. C11-2868 JST (MEJ)

I declare that: I am employed in the County of Alameda, State of California. I am over the age of eighteen years and not a party to the within entitled cause; my business address is 505 Seventeenth Street, Oakland, California 94612.

On August 16, 2013, I served the attached PLAINTIFFS' REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS (NOTICE OF INSPECTION) (SET FIVE) on the parties in said cause, by placing a true copy thereof in a sealed envelope with postage thereon fully prepaid, VIA U.S. MAIL, in Oakland, California, and by causing copies of such documents to be transmitted BY ELECTRONIC MAIL in portable document format ("PDF") from the electronic mail address gina.altomare@sbcglobal.net, addressed as follows:

J. Randall Andrada  
Valerie Ly  
ANDRADA & ASSOCIATES  
180 Grand Avenue, Suite 225  
Oakland, CA 94612  
Email: [randrada@andradalaw.com](mailto:randrada@andradalaw.com)  
[vly@andradalaw.com](mailto:vly@andradalaw.com)

John L. Burris  
Benjamin Nisenbaum  
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[mmg@hudginslaw.com](mailto:mmg@hudginslaw.com)

I declare under penalty of perjury that the foregoing is true and correct and on the date stated above, this declaration was executed at Oakland, California.

Gina Altomare  
GINA ALTOMARE